

ORIGINAL

Paul P. Rooney (PR-0333)
 REED SMITH LLP
 599 Lexington Avenue, 28th Floor
 New York, New York 10022
 (212) 521-5400

Attorneys for Defendant
 Bosch Rexroth Corporation

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X	
PRODUCTION RESOURCE GROUP LLC	: 07 CV 2936 (PKC)
	:
Plaintiff,	:
	:
- against -	: DEFENDANT'S
	: NOTICE OF MOTION TO
BOSCH REXROTH CORPORATION	: ADMIT ARND N. VON WALDOW
	: <u>PRO HAC VICE</u>
Defendant.	:
-----X	

FILED
 U.S. DISTRICT COURT
 S.D. OF N.Y.
 2007 AUG -1 PM 3:26

PLEASE TAKE NOTICE that on August 16, 2007 at 9:30 a.m. upon the annexed Declaration of Paul P. Rooney, dated August 1, 2007, Declaration of Arnd n. von Waldow, dated July 30, 2007, and the exhibits annexed thereto, the undersigned will move this Court at 500 Pearl Street, New York, New York for an order, under Local Rule 1.3(c) of the Local Civil Rules for the United States District Court for the Southern District of New York,

AUG 01 2007
 [Handwritten signature]
 1-504
 # 6023-708

admitting Anrd N. von Waldow to the bar of this Court *pro hac vice* for all purposes as counsel for defendant Bosch Rexroth Corporation.

Respectfully submitted,

REED SMITH LLP

By: 

Paul P. Rooney

599 Lexington Avenue

New York, New York 10022

(212) 521-5435

Attorneys for Defendant

Bosch Rexroth Corporation

Dated: August 1, 2007
New York, New York

Paul P. Rooney (PR-0333)
REED SMITH LLP
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Bosch Rexroth Corporation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
PRODUCTION RESOURCE GROUP LLC	: 07 CV 2936 (PKC)
	:
Plaintiff,	:
	:
- against -	: DECLARATION OF
	: PAUL P. ROONEY IN
	: SUPPORT OF MOTION TO
BOSCH REXROTH CORPORATION	: ADMIT ARND N. VON WALDOW
	: <u>PRO HAC VICE</u>
Defendant.	:
	:
-----X	

PAUL P. ROONEY, an attorney duly admitted to practice law in the State of New York and in this Court, declares the following, under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am Counsel in the law firm of Reed Smith LLP ("Reed Smith"). I submit this declaration, pursuant to Rule 1.3(c) of the Local Rules of Civil Procedure for the Southern District of New York, in support of the instant motion by Defendant Bosch Rexroth Corporation for the admission of Arnd N. von Waldow *pro hac vice* for all purposes in the above-captioned action. I am fully familiar with the facts and circumstances herein.

2. I am a member in good standing in the Bar of the State of New York, as well as the Bar of the United States District Courts for the Southern, Eastern and Northern Districts of New York.

3. Mr. von Waldow is a partner in Pittsburgh, Pennsylvania office of Reed Smith.

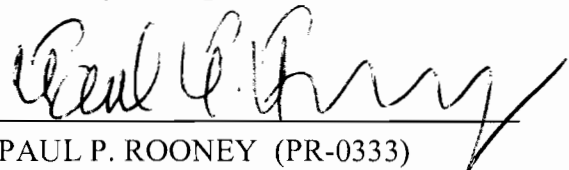
4. Mr. von Waldow is a member in good standing of the Bar of the Commonwealth of Pennsylvania, the Bar of the State of Louisiana, and the Bar of the State of West Virginia.

5. I have reviewed Mr. von Waldow's declaration in support of the Motion for Admission *pro hac vice* submitted herewith and I believe that this Declaration is true and correct.

6. Mr. von Waldow is a highly competent and ethical attorney whom I have known and worked with for over four years.

7. Upon the foregoing facts, I respectfully request that the Court grant the Motion for Admission of Mr. von Waldow *pro hac vice*.

8. I declare that the foregoing is true and correct under the penalty of perjury under the laws of the United States. Executed on this 1st Day of August 2007.


PAUL P. ROONEY (PR-0333)

Paul P. Rooney (PR-0333)
 REED SMITH LLP
 599 Lexington Avenue, 28th Floor
 New York, New York 10022
 (212) 521-5400

Attorneys for Defendant
 Bosch Rexroth Corporation

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X	
PRODUCTION RESOURCE GROUP LLC	: 07 CV 2936 (PKC)
	:
Plaintiff,	:
	:
- against -	: DECLARATION OF
	: ARND N. VON WALDOW IN
BOSCH REXROTH CORPORATION	: IN SUPPORT OF ADMISSION
	: <u>PRO HAC VICE</u>
Defendant.	:
	:
-----X	

1. Pursuant to Local Civil Rule 1.3(c) of the Rules of the United States District Courts for the Southern and Eastern Districts of New York, I am moving for admission to the Bar of this Court *pro hac vice*. I submit this declaration under the penalty of perjury under the laws of the United States in support of said motion.

2. I am a partner in the law firm of Reed Smith LLP, which the Defendant Bosch Rexroth Corporation has retained to represent it in this litigation. I am fully familiar with the facts of this matter.

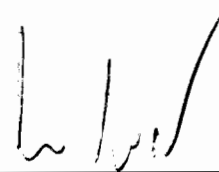
3. I am a 1983 graduate of the University of Pittsburgh School of Law.

4. I am a member in good standing of the Bars of the Commonwealth of Pennsylvania, State of Louisiana, and the State of West Virginia.

5. Original certificates of good standing from the Supreme Court of the Commonwealth of Pennsylvania, State of Louisiana, and State of West Virginia are attached hereto as Exhibit "A", attesting to my good standing.

6. I have read the local rules of this Court and the New York State Lawyers' Code of Professional Responsibility and will faithfully adhere to all rules applicable to my conduct in this Court.

7. I declare under the penalties of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed this 30th day of July 2007 in the Commonwealth of Pennsylvania, County of Allegheny.

A handwritten signature in black ink, appearing to read 'Arnd N. Von Waldow', is written above a horizontal line.

ARND N. VON WALDOW



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Arnd N. von Waldow, Esq.

DATE OF ADMISSION

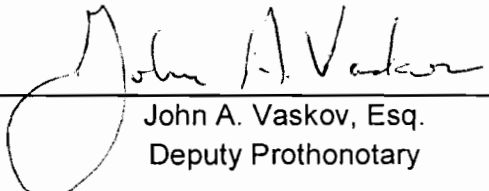
November 27, 1989

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 3, 2007


John A. Vaskov, Esq.
Deputy Prothonotary

United States of America

State of Louisiana

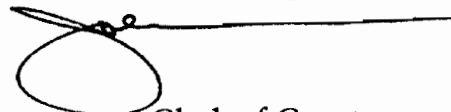
Supreme Court of the State of Louisiana

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

ARND N. VON WALDOW, ESQ., #2159

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 7th Day of October, 1983 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign
my name and affix the seal of this Court,
at the City of New Orleans, this the 6th
Day of July, 2007, A.D.



Clerk of Court
Supreme Court of Louisiana

STATE OF WEST VIRGINIA

I, Rory L. Perry II, Clerk of the Supreme Court of Appeals of West Virginia, hereby do certify that Arnd N. von Waldow of Pittsburgh, Pennsylvania, an attorney duly licensed to practice law in this State, was admitted to practice law before the Supreme Court of Appeals of West Virginia, the highest Court of this State, on the 12th day of July 2001, that he is an attorney in good standing in said Court and is currently on active status, and that his private and professional characters are good.

Given under my hand and the seal of said Court, at Charleston, West Virginia, this 5th day of July, 2007, and in the 145th year of the State.

Rory L. Perry II.

Clerk, Supreme Court of Appeals of West Virginia

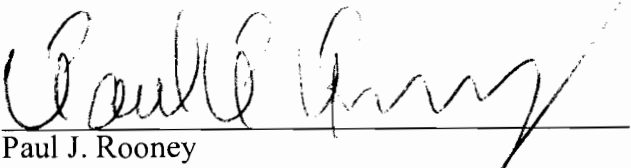


CERTIFICATE OF SERVICE

The undersigned certifies that on August 1, 2007 he caused to be served true and correct copies of the foregoing Bosch Rexroth Corporation's Notice of Motion To Admit Arnd N. von Waldow *Pro Hac Vice* and the annexed Declaration of Paul P. Rooney and Declaration of Arnd N. von Waldow on the following counsel of record by first class United States mail:

Neil G. Marantz, Esq.
Atlas & Marantz LLP
143 Madison Avenue
New York, NY 10016

Dated: New York, New York
August 1, 2007


Paul J. Rooney